

EXHIBIT 18

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Civil Action No. 7:17-cv-08943

5 -----x
6 NATIONAL ASSOCIATION FOR THE ADVANCEMENT
7 OF COLORED PEOPLE, SPRING VALLEY BRANCH,
8 et al.,
9

10
11 Plaintiffs,

12
13 - against -

14
15 EAST RAMAPO CENTRAL SCHOOL DISTRICT,
16 et al.,
17 Defendants.

18 -----x

19
20 March 6, 2018
21 10:06 a.m.

22
23 Deposition of OSCAR COHEN, taken by
24 Defendants, pursuant to Notice, held at the
25 offices of Morgan Lewis & Bockius LLP, 101
Park Avenue, New York, New York, before
Todd DeSimone, a Registered Professional
Reporter and Notary Public of the State of
New York.

1 COHEN

2 O S C A R C O H E N,
3 called as a witness, having been first duly
4 sworn, was examined and testified
5 as follows:

6 EXAMINATION BY MR. LEVINE:

7 Q. Good morning. My name is
8 Randall Levine. I'm an attorney for the
9 East Ramapo Central School District.
10 Could I ask you to state your
11 full name for the record, please.

12 A. Oscar Cohen.

13 Q. Should I address you as
14 Dr. Cohen?

15 A. I do have a doctorate, but
16 address me as you please.

17 Q. All right. Have you ever been
18 deposed before?

19 A. Not to my recollection.

20 Q. Do you understand that you are
21 here today to give testimony in a case
22 called NAACP versus the East Ramapo Central
23 School District?

24 A. I do.

25 Q. Because you haven't been

1 COHEN

2 A. It is a euphemism for public
3 education.

4 Q. The same sentence, same
5 paragraph, you refer to, and I will quote,
6 "a majority of members from the Orthodox
7 and ultra-Orthodox Jewish community
8 (bloc)."

9 What do you mean by "the
10 Orthodox and ultra-Orthodox Jewish
11 community"?

12 A. I mean the private school
13 community.

14 Q. What's the private school
15 community?

16 A. The community that sends their
17 children to private schools.

18 Q. Are they all Orthodox and
19 ultra-Orthodox Jews?

20 MR. JASON: Objection,
21 foundation.

22 A. I don't know.

23 Q. Why did you refer in this
24 sentence to "the Orthodox and
25 ultra-Orthodox Jewish community"?

1 COHEN

2 A. Yes.

3 Q. So when you say "seats
4 currently controlled by private school
5 interests," you mean board members who are
6 supported by the Orthodox and
7 ultra-Orthodox Jewish communities, right?

8 A. I mean board members who
9 ascribe to the private schooling of the
10 children for whom they -- for their own
11 children, for the most part.

12 Q. And by that, as we have
13 established from looking at these other
14 documents, I thought, when you are talking
15 about the private school community, you
16 mean, at least primarily, the Orthodox and
17 ultra-Orthodox Jewish community, right?

18 A. Correct.

19 Q. So in the next sentence, when
20 you say "white preferred candidates would
21 still, in all likelihood, be shoo-ins for
22 the remaining five seats," you are now
23 using another phrase to mean the same
24 thing, "white preferred candidates" refer
25 to candidates supported by the Orthodox and

1 COHEN

2 Hasidic Jewish communities, right?

3 MR. JASON: Objection,
4 mischaracterizes testimony.

5 Q. You can answer.

6 A. Whose children are just about
7 100 percent white, correct.

8 Q. So when you say "white
9 preferred candidates" in this sentence, you
10 mean candidates supported by the Orthodox
11 and Hasidic Jewish communities, right?

12 A. Correct.

13 Q. You say that they "would, in
14 all likelihood, be shoo-ins for the
15 remaining five seats." What do you mean by
16 that?

17 A. What paragraph?

18 Q. Last paragraph, right after the
19 phrase "white preferred candidates," in the
20 last paragraph, the next clause is "in all
21 likelihood, be shoo-ins."

22 So what do you mean when you
23 say "white preferred candidates would
24 still, in all likelihood, be shoo-ins for
25 the remaining five seats"?

I N D E X

WITNESS	EXAMINATION BY	PAGE
COHEN	LEVINE	4

E X H I B I T S

COHEN	DESCRIPTION	PAGE
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REQUESTS

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(NONE)	

CERTIFICATION

I, TODD DeSIMONE, a Notary Public for
and within the State of New York, do hereby
certify:

That the witness whose testimony as
herein set forth, was duly sworn by me; and
that the within transcript is a true record
of the testimony given by said witness.

I further certify that I am not related
to any of the parties to this action by
blood or marriage, and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 6th day of March, 2018.

Todd Desimone

TODD DESIMONE

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